

File Def What was assigned

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AB:JEA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

RONALD DAVIES, *- FDNY appointed.*
Defendant.

PRE-ARRAIGNMENT
COMPLAINT

(21 U.S.C. § 841)

18-M-860

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EASTERN DISTRICT OF NEW YORK, SS:

KYLER HARDIN, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigation ("HSI") duly appointed according to law and acting as such.

On or about September 12, 2018, within the Eastern District of New York, the defendant RONALD DAVIES, together with others, did knowingly, intentionally and unlawfully attempt to distribute and possess with intent to distribute a substance containing 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance.

(Title 21, United States Code, Section 841).

The source of your deponent's information and belief are as follows:¹

1. In or about August 2018, law enforcement intercepted several packages that were found to contain narcotics, including MDMA and Ketamine, which were addressed to an individual, later identified as confidential source (CS-1). Following his/her arrest, CS-1 permitted law enforcement to assume his/her identity on an encrypted messaging application known as Signal for the purposes of intercepting any communications sent to CS-1 from an unidentified male who is a suspected narcotics trafficker ("UM-1"). Based on information obtained from CS-1, UM-1 had enlisted CS-1's assistance in coordinating shipments of 3,4-methylenedioxymethamphetamine ("MDMA"), among other narcotics. Specifically, UM-1 sent CS-1 preprinted shipping labels that all were addressed to Handsome Skeleton, LLC, 78 Beaver Street, PMB 133, Brooklyn, New York 11206 (the "Handsome Skeleton Address").

2. Thereafter, law enforcement identified UM-1 who agreed to cooperate with the investigation as a confidential source ("CS-2"). CS-2 informed law enforcement that the delivery to the Handsome Skeleton Address was requested by an individual who s/he communicated with on a text messaging application known as Wickr, using the username p4ssage. CS-2 further informed law enforcement that p4ssage had ordered approximately 8 kilograms of MDMA and 5 kilograms of Ketamine to be delivered to the Handsome Skeleton Address. In addition, CS-2 explained that s/he had shipped narcotics to p4ssage previously, and that p4ssage paid CS-2 in the cryptocurrency Bitcoin.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. CS-2 permitted law enforcement to assume his/her identity on Wickr for the purposes of intercepting any communications sent to p4ssage. Thereafter, law enforcement officers posing as CS-2 (“the Undercover Officers”) received instructions from p4ssage, via Wickr, regarding the narcotics shipment. Specifically, p4ssage provided confirmation of instructions regarding the delivery of the narcotics packages to the Handsome Skeleton Address.

4. Law enforcement thereafter reviewed publicly accessible portions of Facebook, which review revealed a business page for “Handsome Skeleton LLC” and listed a single employee as “Ronnie Brown.” Further review revealed Ronnie Brown’s Facebook page with the URL <https://www.facebook.com/P4ssage> and the Username P4ssage. Law enforcement also reviewed information obtained from the digital currency exchange Coinbase regarding the user account p4ssage@gmail.com, which belongs to the defendant RONALD DAVIES. Upon further investigation, law enforcement compared the photographs of Ronnie Brown on Facebook with the defendant DAVIES’s photographs on Coinbase and determined that it was the same person. In addition, law enforcement conducted searches of public available databases for the defendant DAVIES, and found the Handsome Skeleton Address listed as one of his addresses.

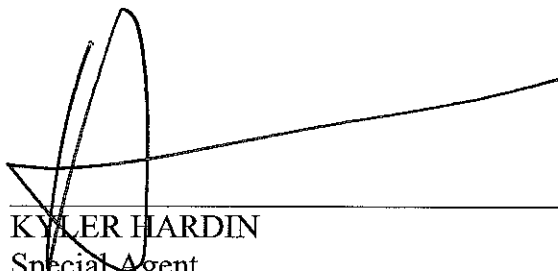
5. On or about September 6, 2018, four packages containing sham materials (the “Packages”) was delivered to the Handsome Skeleton Address. On or about September 12, 2018, the defendant RONALD DAVIES retrieved the Packages along with four additional packages and took it to 488 Jefferson Street, Apartment 217, Brooklyn, New York, 11237 (the “488 Jefferson Address”).

6. At approximately 10:00 pm on September 12, 2018, law enforcement executed a federal search warrant issued in the Eastern District of New York for a search of the 488 Jefferson Address. A search of the premises revealed several items of note, including the Packages, three packages containing bags of approximately 5,240 pills total, additional narcotics, \$63,850 in U.S. currency, and narcotics trafficking paraphernalia.

7. On September 12, 2018 the defendant, RONALD DAVIES, was admitted to Woodhull Hospital. The defendant will be detained at Woodhull Hospital until such time as he is medically fit to be arraigned.

WHEREFORE, your deponent respectfully requests that the defendant RONALD DAVIES be dealt with according to law.

Dated: Brooklyn, New York
September 13, 2018



KYLER HARDIN
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

~~Sworn to before me this~~
~~13th day of September 2018~~

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JUDGE
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